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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. CV 18-8570-DDP

**NOTICE OF ERRATA TO THE
REAL PROPERTY LOCATED IN MARICOPA
COUNTY, ARIZONA (PV 1)**

ANY AND ALL FUNDS SEIZED FROM
BANK FRICK ACCOUNT 'K000 K;
ANY AND ALL FUNDS SEIZED FROM
BANK FRICK ACCOUNT 'K000 U;
ANY AND ALL FUNDS SEIZED FROM
BANK FRICK ACCOUNT 'K000 E;
AND ANY AND ALL FUNDS SEIZED
FROM BANK FRICK ACCOUNT 'K001
K,

Defendants.

PLEASE TAKE NOTICE of the following errata in the civil
forfeiture complaint filed October 5, 2018 (Dkt. No. X):

1. Under the Heading ASSETS HELD BY OR FOR THE BENEFIT OF
MICHAEL LACEY, paragraph "4.r." was misplaced. That paragraph
should have been included in the section headed, "ASSETS HELD BY OR

1 FOR THE BENEFIT OF JAMES LARKIN," which section presently begins at
2 paragraph "4.t.";

3 2. Under the section headed, "MICHAEL LACEY ASSETS," which
4 section presently begins at paragraph 53, sub-paragraph "M" was
5 misplaced. That sub-paragraph should have been included in the
6 section headed, "JAMES LARKIN ASSETS," which section presently
7 begins at paragraph 77; and

8 3. The section headed, "JAMES LARKIN ASSETS," present
9 paragraph 77 contains inaccurate information. Paragraph 74
10 presently reads,

11 Approximately \$11,480,000 million in illicit funds from
12 Backpage's U.S. Bank account '1165 passed-through various
13 Backpage or Backpage Operators accounts, eventually (between
14 March 15 and September 18, 2014) ending up in BMO Harris
15 account '5263, owned or controlled by Lacey. Thereafter, on
16 March 30, 2015, BMO Harris Bank account '5263 transferred
17 \$774,379.46 towards the purchase of the Paradise Valley
18 Property 1.

19 / / /

20 / / /

1 Instead, paragraph 74 should read,

2 Approximately \$41.5 million in illicit funds from
3 Backpage's U.S. Bank account '1165 passed through various
4 Backpage or Backpage Operators accounts. Following these
5 various transfers, eventually, on October 2, 2013, a total
6 of approximately \$26,130.64 was transferred into BMO
7 Harris account '3110, owned or controlled by Larkin.
8 Thereafter, on December 11, 2014, BMO Harris Bank account
9 '3100 paid \$46,957.28 to maintain the Paradise Valley
10 property 1.

11 Dated: October 9, 2018

Respectfully submitted,

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14 LAWRENCE S. MIDDLETON
15 Assistant United States Attorney
16 Chief, Criminal Division
17 STEVEN R. WELK
18 Assistant United States
19 Chief, Asset Forfeiture Section

20 /s/John J. Kucera
21 JOHN J. KUCERA
22 Assistant United States Attorney

23 Attorneys for Plaintiff
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